



I oppose plan confirmation because the **Debtor has failed to:**

☐ schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtor is not eligible to be a Chapter 13 Debtor as follows:

☐ **disclose** [11 USC §521, LBR 1017-1(b)]  
☐ assets ☐ creditors ☐ income ☐ prior case

☐ **serve all** creditors using court mandated notice form with a copy of the plan pursuant to FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);

☒ provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;  
**- Completed.**

☐ meet the **business reporting requirements** regarding Debtor's business or self-employment, LBR 3015-1(c)(4);

☐ provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC §§ 1308 and 521, LBR 3015-1(c)(3).

☒ propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because  
☒ certain claims are not included and/or the amount provided is insufficient

**Comparison of Filed Claims to Claims Stated in Plan:**

<u>Creditor</u>	<u>Acct #</u>	<u>Class</u>	<u>Claim</u>	<u>Plan</u>	<u>Notes</u>
Wells Fargo	7361	2	\$1,146	\$775	2TD/Equity line
Wells Fargo	3059	2	\$4,753	\$3,450	1TD
LBPM HOA		3C	no poc filed	\$9,234	HOA

☐ income is not sufficient enough to fund it

☐ plan payment will not retire debt within term

☐ the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:

☐ propose a plan that represents the Debtor's **best effort** 11 USC §1322; 11 USC §1325

☐ unreasonable and/or unnecessary expenses are scheduled

☐ the budget surplus exceeds the monthly plan payment

☐ comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464

☐ propose a plan that provides creditors as much as would be received under **Chapter 7** 11 USC §1325(a)(4).

☒ other issues as stated below:  
**- \*\*\*Issues as of audit 7/18/22.**

In Re: Linda M Ramirez	Chapter 13
Debtor(s)	Case Number: 9:22-bk-10383-RC

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
15260 Ventura Blvd., Suite 710, Sherman Oaks, CA 91403

A true and correct copy of the foregoing document entitled: TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN; DECLARATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Order and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 7/18/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

UNITED STATES TRUSTEE (ND): USTPREGION16.ND.ECF@USDOJ.GOV  
JOHN K ROUNDS: JROUNDS@RSLAWLLP.COM

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On 7/18/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

LINDA M RAMIREZ, 2213 MIRAMAR WALK, OXNARD, CA 93035

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:**

Pursuant to F.R.Civ.P.5 and/or controlling LBR, on 7/18/2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

HONORABLE JUDGE RONALD A CLIFFORD III - VIA OVERNIGHT MAIL

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

7/18/2022

Date

Sophia Lawrence

Printed Name

/s/ Sophia Lawrence

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.